

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN	:	
	:	
and	:	
	:	
KAMIL EKIM ALPTEKIN,	:	
	:	
Defendants.	:	

DEFENDANT BIJAN RAFIEKIAN'S AMENDED TRIAL EXHIBIT LIST

DEX	DATE	DOCUMENT
1.	07/29/2016	Email from B. Kian to M. Flynn, re: Ekim Alptekin
2.	09/01/2016	Email from J. Courtovich to B. Kian, cc'd to G. Miller, G. Lowman, and J. Kelly, re: FARA (attachment Kelner white paper <i>Have We Reached a FARA "Tipping Point?"</i>)
3.	09/01/2016	Email from B. Kian to R. Kelner, cc'd C. Pilgram, re: Scheduling a call
4.	09/03/2016	Email from B. Kian to M. Flynn, re: confidence
5.	09/03/2016	Email from B. Kian to M. Flynn, re: CONFIDENCE
✓ 6.	09/14/2016	Declassified Memo re September 14, 2016 Meeting with Michael Flynn
7.	09/16/2016	Email from B. Kian to R. Kelley, re: LDA form
8.	09/16/2016	Email from B. Kelley to B. Kian, re: LDA Steps
9.	09/18/2016	Email from B. Kian to E. Alptekin, re: Talking points
10.	09/21/2016	Email from C. Pilgram to B. Kelley, re: Friday 1030 Sept ??
11.	09/23/2016	Email from C. Pilgram to T. Newberry, E. Jensen Yokoi, B. Kian, A. Udvig, & M. Boston, re: RE: FIG Research Support Agreement

✓ Stip. (7/22)

DEX	DATE	DOCUMENT
12.	09/23/2016	Email from B. Kian to T. Newberry, E. Socolosky, A. Udvig, M. Flynn, M. Boston, & B. McCauley, re: Re: FIG Research Support Agreement
13.	09/26/2016	Email from G. Miller to B. Kelley, B. Kian, cc'd M. Boston, re: Connecting
✓ 14.	09/28/2016	Declassified Memo re September 28, 2016 Meeting with Bijan Kian
15.	09/30/2016	FIG Lobbying Registration LD-1 Disclosure Form
16.	09/30/2016	Email from R. Kelley to B. Kian, re: Farwell
17.	10/11/2016	Email from M. Boston to J. Graham, R. Kelley, cc'd B. Kian, re: Info on Client LDA reporting
18.	10/12/2016	Email from R. Kelley to M. Boston cc'd B. Kian, re: re
19.	10/14/2016	Email from Elliott Investigative Services to Brian McCauley, re: Quick Call
20.	10/19/2016	Email from C. Walling to G. Miller, re: Monopoly (attachment Mula Mullah Board)
21.	10/19/2016	Email from J. Courtovich to G. Miller, re: Board Game
22.	10/21/2016	Email from B. Kian to M. Boston, re: Updates (attachments Texas One Page, Gulen Briefing Sheet, Gulenopoly, Charter Schools and IRS, Mula Mullah Board)
23.	10/31/2016	Email from C. Walling to G. Miller, re: Gulenopoly (attachment Gulenopoly)
24.	10/31/2016	Email from M. Boston to B. McCauley, G. Miller, E. Jensen Yokoi, B. Kian, T. Newberry, & C. Pilgram, re: Project meeting Wednesday at noon our office suite (attachments FIG Presentation and Gulenopoly)
25.	11/05/2016	Statement of the Problem – Facts Bearing on the Problem of the Gulen Ecosystem
26.	11/05/2016	Email from B. Kian to M. Flynn and M. Boston, re: Working papers for your review
27.	11/06/2016	Email from M. Ledeen to M. Flynn, re: Please Review draft OPED on Turkey
28.	11/09/2016	SGR LLC LDA Form

✓ stip. (7/22)

DEX	DATE	DOCUMENT
29.	11/12/2016	Email from B. Kian to M. Flynn Jr, cc'd M. Flynn re is this a problem??
30.	11/14/2016	Email from B. Kian to E. Alptekin, re: Corrected invoice
31.	11/18/2016	Email from B. Kian to J. Courtovich, cc'd G. Miller, re: ...the media storm
32.	11/18/2016	Email from J. Courtovich to B. Kian and G. Miller, re: General Flynn Clips
33.	11/18/2016	Email from B. Kian to J. Courtovich
34.	11/18/2016	Email from T. Spencer to W. Burck, B. Kian, and R. Kelley, re: Statement of Inovo (attachments: 18_NOV_2016 – Copy & Untitled attachment)
35.	11/18/2016	Email from W. Burck to T. Spencer, cc'd to B. Kian, and R. Kelley, re: Statement of Inovo
36.	11/22/2016	Email from B. Kian to G. Miller
✓ 37.	12/14/2016	Email from J. Courtovich to E. Alptekin, re: Follow-up
38.	12/22/2016	Email from B. Kian to B. Kian and zulutym@gmail.com, re: <i>No Subject</i>
39.	12/26/2016	Email from E. Alptekin to B. Kian, re: Article of General Flynn
40.	12/27/2016	Email from G. Miller to J. Courtovich, re: Time sensitive – FIG close out memo (attachment Engagement Summary and Notification of LDA Termination)
41.	01/09/2017	Letter from R. Kelner to M. Flynn, re engagement to represent Flynn Intel Group
42.	01/09/2017	Letter from R. Kelner to M. Flynn, re: engagement for FARA advice
43.	01/09/2017	Email from J. Courtovich to B. Kian, re: Turkey FARA Breakdown
44.	01/22/2017	Email from J. Courtovich to E. Alptekin and cc'd to G. Miller, re: DRAFT Plan for Turkey (attachment Turkey Proposal)
45.	01/23/2017	Email from J. Courtovich to B. Kian, cc'd G. Miller, re: Just a heads up
46.	01/23/2017	Email from E. Alptekin to J. Courtovich, cc'd to G. Miller, re: Draft Plan for Turkey

DEX	DATE	DOCUMENT
47.	01/24/2017	Email from J. Courtovich to B. Kian, cc'd to G. Miller, re: TR
48.	01/24/2017	Email from J. Courtovich to E. Alptekin
49.	01/24/2017	Email from M. Nolan to E. Alptekin & S. Akyuz, re: FW: Inovo and FARA
50.	01/25/2017	Email from G. Miller to E. Alptekin and cc'd to J. Courtovich, re: Proposal (attachment Turkey Proposal)
✓ 51.	01/25/2017	Email from J. Courtovich to ttuncer@mfa.gov.tr and cc'd to G. Miller, re: Public Affairs Proposal (attachment Turkey Proposal)
52.	01/25/2017	Email from J. Courtovich to E. Alptekin, re: Skype call w/ Ekim Alptekin
53.	01/31/2017	Email C. Amindaray to G. Miller, re: Turkey Pitch Notes (attachment Turkey Pitch Notes)
✓ 54.	01/31/2017	Email from J. Courtovich to B. Kian, re: Meeting w/ Turkish DCM
55.	02/01/2017	Email from G. Miller to C. Amundaray and S. Looney, re: Turkey (attachment Turkey Proposal)
56.	02/06/2017	Email from J. Courtovich to G. Miller, re: Budget Proposal
57.	02/06/2017	Email from E. Alptekin to G. Miller, cc'd J. Courtovich, re: Re: Budget proposal
58.	02/07/2017	Email from J. Courtovich to B. Kian, cc'd to G. Miller
59.	02/15/2017	Email from G. Miller to J. Courtovich, re: Timeline
✓ 60.	03/07/2017	Complete FIG FARA Filing
61.	03/09/2017	Email from J. Courtovich to E. Alptekin, cc'd B. Kian, re: Press
62.	06/14/2017	Video – FY 2018 State Department Budget Request, Opening Remarks Before the House Committee on Foreign Affairs, 115th Cong. (2017) (statement of Rex W. Tillerson, Secretary of state, on Muslim Brotherhood)
63.	10/27/2017	Declaration of R. Kelley
64.	06/13/2018	Letter from Robert Kelner & Stephen Anthony to James Gillis

✓ GM (7/17)

✓ JG (7/16)

DEX	DATE	DOCUMENT	
65.	01/18/2019	FIG Certificate of Dissolution	
✓ 66.	07/12/2019	Document Received from Government at July 12, 2019 Hearing	✓ Stip. (7/22)
67.	07/13/2019	Fahrettin Altun AP Tweet	
68.	-	RESERVED	
✓ 69.	08/28/2015	August 28, 2015 Contract between Amsterdam & Partners LLP and Turkey	✓ JG (7/16)
✓ 70.	10/26/2015	Amsterdam & Partners LLP, Exhibit A (Fara Reg. no. 6325)	
✓ 71.	10/26/2015	Amsterdam & Partners LLP, Robert R. Amsterdam Short Form (Fara Reg. no. 6325)	
✓ 72.	05/31/2016	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)	✓ JG (7/16)
✓ 73.	05/31/2016	Amsterdam & Partners LLP, Andrew Durkovic Short-Form (Fara Reg. no. 6325)	✓ JG (7/16)
74.	06/08/2016	Video – Robert Amsterdam Address to DHS Secretary Johnson over Fethullah Gülen	
75.	08/19/2016	Video – After The Coup: Interview with lawyer Robert Amsterdam on Gulen's extradition	
✓ 76.	11/30/2016	Amsterdam & Partners LLP, Supplemental Statment (Fara Reg. no. 6325)	✓ JG (7/16)
✓ 77.	2017	Empire of Deceit (PDF) (BOOK)	
77A.	2017	Empire of Deceit (Book)	
✓ 78.	06/01/2017	Amsterdam & Partners LLP, Supplemental Statment (Fara Reg. no. 6325)	✓ JG (7/16)
79.	09/15/2017	Amsterdam & Partners LLP, Informational Materials – Billboard disclosure (Fara Reg. no. 6325)	
80.	09/22/2017	Amsterdam & Partners LLP, Informational Materials – NYT Advertisement (Fara Reg. no. 6325)	
✓ 81.	11/30/2018	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)	✓ JG (7/16)

DEX	DATE	DOCUMENT
✓ 82.	05/29/2019	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)
83.	-	Empire of Deceit Website Homepage
84.	12/31/2015	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending December 31, 2015
85.	06/30/2016	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending June 30, 2016
✓ 86.	12/31/2016	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending December 31, 2016
87.	06/30/2017	Report of the Attorney General to the Congress of the United State on the Administration of the Foreign Agents Registration Act of 1938, as amended for the six months ending June 30, 2017
88.	12/31/2017	Report of the Attorney General to the Congress of the United State on the Administration of the Foreign Agents Registration Act of 1938, as amended for the six months ending December 31, 2017
89.	-	Flynn Intel Group, Inc. - Bylaws
90.	09/04/2017	Email from R. Kelner to S. Anthony, B. Smith, & A. Langton, re: FW: Potential FARA Client
91.	05/04/2017	Covington & Burling LLP Invoice addressed to General Michael T. Flynn re: Regulatory Advice
✓ 92.	01/09/2017	Letter from R. Kelner to Gen. M. Flynn
✓ 93.	03/31/2017	Covington & Burling LLP Proforma addressed to General Michael T. Flynn re: Regulatory Advice
✓ 94.	02/28/2017	Covington & Burling LLP Proforma addressed to General Michael T. Flynn re: Regulatory Advice
95.	06/27/2019	Memo to J. Gillis and Prosecution Team in US v. Rafiekian from S. Powell and M. Flynn Defense Team re: Unprivileged Material from Covington & Burling Flynn File

✓ JG (7/16)

✓ RK (7/16)

✓ RK (7/16)

✓ RK (7/16)

DEX	DATE	DOCUMENT	
✓ 95A.	07/11/2019	Flynn Intel Group, Inc – Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended	✓ RK (7/16)
96.	03/07/2017	Email from B. Smith to R. Kelner, K. Verderame, cc'd A. Langton, re: RE: Open Items	
✓ 97.	06/07/1979	Turkey: Extradition and Mutual Assistance in Criminal Matters	✓ JD (7/16)
✓ 98.	-	Rules of Professional Conduct: Rule 1.7—Conflict of Interest: General Rule	✓ RK (7/16)
✓ 99.	03/31/2017	Covington & Burling LLP Invoice addressed to General Michael T. Flynn re: Regulatory Advice	✓ RK (7/16)
✓ 100.	02/24/2017	Letter from R. Kelner to General Flynn re: Regulatory Advice, Acct. No. 039305.0001	✓ RK (7/16)
101.	11/30/2017	Executed & Accepted Michael T. Flynn Plea Agreement from Robert Mueller to Robert Kelner & Stephen Anthony	
✓ 102.	04/26/2017	Email from A. Langton to zulutym@maisol.net, M. Flynn, K. Verderame, cc'd R. Kelner, S. Anthony, & B. Smith, re: Request	✓ GM (7/17)
✓ 102A.	07/30/2016	Email from B. Kian to E. Alptekin & M. Flynn, re: Truth	✓ RK (7/16)
✓ 102B.	07/30/2016	Email from M. Flynn to M. Flynn, re: Truth	✓ RK (7/16)
✓ 102C.	08/04/2016	Email from B. Kian to E. Alptekin & M. Flynn, re: Re: Truth	✓ RK (7/16)
✓ 102D.	08/08/2016	Email from E. Alptekin to M. Flynn & B. Kian, re: Re: Truth	✓ RK (7/16)
✓ 102E.	08/08/2016	Email from B. Kian to E. Alptekin & M. Flynn, re: Re: Truth	✓ RK (7/16)
✓ 102F.	08/04/2016	Email from E. Alptekin to M. Flynn & B. Kian, re: Re: Truth	✓ RK (7/16)
✓ 102G.	08/10/2016	Email from E. Alptekin to M. Flynn & B. Kian, re: Re: Truth	✓ RK (7/16)
✓ 102H.	08/25/2016	Email from B. Kian to E. Alptekin & M. Flynn, re: Action Update	✓ RK (7/16)
✓ 102I.	09/03/2016	Email from B. Kian to E. Alptekin & M. Flynn, re: CONFIDENCE	✓ RK (7/16)
✓ 102J.	09/12/2016	Email from B. Kian to M. Flynn & M. Flynn, re: Advisory Agreement (General Scope) for Ekim Alptekin	✓ RK (7/16)
✓ 102K.	10/07/2016	Email from B. Kian to E. Alptekin, re: Invoice	✓ RK (7/16)

DEX	DATE	DOCUMENT	
✓ 102L.	10/11/2016	Email from B. Kian to M. Flynn, re: Wire Transfer to INOVO BV	✓ RK (7/16)
✓ 102M.	10/14/2016	Email from B. Kian to M. Flynn, re: Fwd: Inovo	✓ RK (7/16)
103.	11/08/2016	Email from G. Miller to B. Kian & M. Boston, re: Article placement	
104.	11/08/2016	Email from G. Miller to B. Rehkopf, cc'd C. Jordan, re: Re: Gen. Flynn op-ed	
105.	10/11/2016	Email from T. Neer to B. McCauley, re: Fwd: Links	
✓ 106.	05/23/2016	Fox News – Gen. Flynn: Why the silence about the deadly terror threat in our own hemisphere? by Michael Flynn	✓ GM (7/17)
✓ 107.	07/09/2016	NY Post – The military fired me for calling our enemies radical jihadis, by Michael Flynn	✓ GM (7/17)
✓ 108.	11/07/2016	The Hill – Our ally Turkey is in crisis and needs our support, by Michael Flynn	✓ GM (7/17)
✓ 109.	10/06/2016	Fox News – Gen. Mike Flynn: Why Hillary's record on Libya is even worse than you think, by Michael Flynn	✓ GM (7/17)
✓ 110.	08/03/2016	Fox News – Gen. Mike Flynn, Rep. Allen West, Dr. David Grantham: Yes, we can defeat terrorism, by Michael Flynn, Allen West, & Dr. David Grantham	✓ GM (7/17)
✓ 111.	04/18/2016	Fox News – Lt. Gen. Michael Flynn: America has forgotten how to win at war, by Michael Flynn	✓ GM (7/17)
✓ 112.	11/02/2016	Fox News – Gen. Michael Flynn: After Mosul is liberated, ISIS could attach US next, by Michael Flynn	✓ GM (7/17)
✓ 113.	10/28/2018	Fox News – Gens. Flynn, Kellogg: The truth about what's happening in Mosul (hint: Trump's right)	✓ GM (7/17)
114.	09/01/2016	Email from B. Kian to J. Courtovich, cc'd G. Miller, G. Lowman, & John Kelly, re: Re: FARA	
115.		Decree No. 32 on the Protection of the Value of Turkish Currency	
116.	1/21/2016	Mondaq – Turkey: Restrictions and Notification Requirements Amended for Currency Transfers Across Turkish Borders	
✓ 117.		Photo of Michael T. Flynn	✓ BA (7/18)

Dated: July 19, 2019

Respectfully submitted,

/s/

Mark J. MacDougall (*Pro Hac Vice*)
Stacey H. Mitchell (*Pro Hac Vice*)
Counsel for Bijan Rafiekian
Akin Gump Strauss Hauer & Feld LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036
Telephone: (202) 887-4000
Fax: (202) 887-4288
E-mail: mmacdougall@akingump.com
shmitchell@akingump.com

/s/

Robert P. Trout (VA Bar # 13642)
Counsel for Bijan Rafiekian
Trout Cacheris & Solomon PLLC
1627 Eye Street, NW
Suite 1130
Washington, DC 20006
Telephone: (202) 464-3311
Fax: (202) 463-3319
E-mail: rtrout@troutcahceris.com

CERTIFICATE OF SERVICE

I hereby certify that, on the 19th day of July 2019, true and genuine copies of Defendant Bijan Rafiekian's Second Amended Trial Exhibit List were sent via electronic mail by the Court's CM/ECF system to the following:

James P. Gillis
John T. Gibbs
Evan N. Turgeon
U.S. Attorney's Office (Alexandria-NA)
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3700
Email: james.p.gillis@usdoj.gov
john.gibbs@usdoj.gov
evan.turgeon@usdoj.gov

Sidney Powell
Sidney Powell, P.C.
2911 Turtle Creek Blvd., Suite 300
Dallas, Texas 75219
Telephone: (352) 630-5788
Email: sidney@federalappeals.com

/s/
Robert P. Trout (VA Bar # 13642)